

EXHIBIT C



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May 16, 2022

SENT VIA EMAIL: npullella@cml-law.net

Nicole L. Pullella, Esquire
Carpenter, McCadden, & Lane, LLP
1615 West Chester Pike, Suite 105
West Chester, PA 19382

Re: Rosaline El-Khoury v. FK Intermediate, LLC d/b/a Fireking Security Group
USDC, EDPA, Civil Action No. 20:21-CV-5323

Dear Ms. Pullella:

I represent the plaintiff, Rosaline El-Khoury, in the above-captioned matter. In early February 2022, I served your client, CVS Pharmacy, with a subpoena, a copy of which is enclosed. That subpoena sought any and all documents:

- Related to or referencing the safe depicted in Exhibit “B” (the “Safe”), which is installed in the CVS pharmacy located at 55 Park Avenue, Collegeville, Pennsylvania 19426 (the “Collegeville CVS”);
- Concerning construction and/or renovation projects performed at the Collegeville CVS in in the last ten (10) years, including but not limited to the renovation that took place in 2017, which included the installation of a consultation room; and
- Containing the identities of all employees who were present at the Collegeville CVS on July 6, 2021, the date on which Ms. El-Khoury, suffered a work-related injury.

After receiving no response, I sent multiple follow-up letters and emails to CVS Pharmacy, all of which were similarly ignored. Your client’s silence necessitated the filing of a Motion to Enforce on March 14, 2022, which is currently pending before Judge Cynthia M. Rufe in the United States District Court for the Eastern District of Pennsylvania.

When I received your email and letter yesterday morning, I was hopeful that I had finally received the documents I requested more than two-and-a-half months ago. Unfortunately, that was not the case. The documents you provided are in no way responsive to the subpoena served upon CVS Pharmacy. The documents do not contain any

Nicole L. Pullella, Esquire
Carpenter, McCadden, & Lane, LLP
Page 2
May 16, 2022

information relating to the Safe, construction/renovation projects at the Collegeville CVS, or the identities of potential eye witnesses. They instead concern Ms. El-Khoury's workers' compensation claim, which is not mentioned in the subpoena and has nothing to do with the above-captioned case.

By this letter, I am requesting that your client immediately produce documents responsive to Plaintiff's subpoena. If I do not receive a copy of responsive documents by or before April 29, 2022, I will no choice but to move for the imposition of sanctions against CVS Pharmacy. Please advise your client accordingly.

Thank you in advance for your cooperation. Please let me know if you have any questions.

Respectfully,

HAMBURG, RUBIN, MULLIN,
MAXWELL & LUPIN

By: 
KEVIN M. McGRATH

KMM:
Enclosure